

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SOVEREIGN PEAK VENTURES, LLC,

Plaintiff,

vs.

**LG ELECTRONICS INC. and LG
ELECTRONICS USA, INC.,**

Defendants.

Civil Action No. 2:20-cv-109-JRG

DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL

Defendants LG Electronics Inc. and LG Electronics USA, Inc. ("Defendants") respectfully request leave to file under seal their Motion to Transfer for Improper Venue Pursuant to 28 U.S.C. § 1406(a) (the "Motion") and supporting declarations and exhibits. There is currently no Protective Order entered in this matter. Nevertheless, Defendants' Motion, declaration, and exhibits thereto refer to and include documents designated "confidential" and constituting Defendants' business information. Plaintiff has informed Defendants that Plaintiff does not oppose this Motion for Leave to File Documents Under Seal.

Dated: August 5, 2020

By: /s/ Allan A. Kassenoff

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*Attorneys for Defendants LG Electronics Inc. and LG
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CERTIFICATE OF SERVICE

The undersigned certifies that on this 5th day of August, 2020, all counsel of record are being served with a copy of this document via email.

/s/ Allan A. Kassenoff
Allan A. Kassenoff